

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHRISTOPHER CRENSHAW,	:	CIVIL DIVISION
administrator of the Estate of	:	
THOMAS CRENSHAW	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
	:	
UNITED STATES OF AMERICA	:	
	:	NO. 02-CV-4006
Defendant.	:	
	:	

Rule 26(f) Discovery Plan Report of Plaintiff and Defendant

In accordance with Federal Rule of Civil Procedure 26(f) Plaintiff Christopher Crenshaw, by his Counsel Adam M. Starr, Esquire, and Defendant United States of America, by its attorney, Patrick L. Meehan, United States Attorney for the Eastern District of Pennsylvania and Paul G. Shapiro, Assistant United States Attorney for said District, submit this written report outlining the discovery plan agreed upon by counsel at a Rule 26(f) conference held on September 23, 2002. The parties have agreed as follows:

1. **Rule 26(a) Disclosure:** Initial Disclosures as called for by Rule 26(a)(1) have been served by both parties;
2. **Contemplated discovery:** Fact discovery as the case is currently constituted can be completed by February 28, 2003 and may include interrogatories, document requests and depositions as deemed appropriate by the parties, in light of the Initial Disclosures, and in accordance with the Federal Rules. The parties contemplate the use of medical experts. Expert discovery will require additional time. Plaintiff's expert reports are to be served within 45 days of defendants' responses to plaintiff's interrogatories, requests for production and requests for admission, which discovery will be served within 3 weeks of the Rule 26(f) conference. The parties recognize that plaintiff's reports are preliminary only and that they may be supplemented within 45 days of the last anticipated deposition of defendant's employee/servant/agent. Defendant's expert reports are to be served

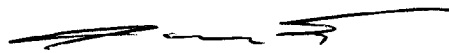
with 60 days of defendant's receipt of plaintiff's supplemental expert report.

The parties reserve the right to serve requests for admission at a later time.

3. **Changes or limitations on discovery:** None other than, as noted above, that expert discovery will be completed after the end of the currently contemplated fact discovery.
4. **Other orders:** None at this time.

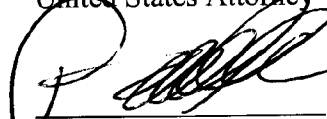
Respectfully submitted,

Dated: October 10, 2002



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United States Attorney



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Attorney for the United States

Dated: October 16, 2002